

Jennie Lee Anderson (SBN 203586)  
Lori E. Andrus (SBN 205816)  
**ANDRUS ANDERSON LLP**  
155 Montgomery Street, Suite 900  
San Francisco, California 94104  
Telephone: 415-986-1400  
[jennie@andrusanderson.com](mailto:jennie@andrusanderson.com)  
[lori@andrusanderson.com](mailto:lori@andrusanderson.com)

Adam J. Levitt (*pro hac vice*)  
**DICELLO LEVITT LLP**  
Ten North Dearborn Street, Sixth Floor  
Chicago, Illinois 60602  
Telephone: 312-214-7900  
alevitt@dicelolevitt.com

W. Daniel "Dee" Miles, III (*pro hac vice*)  
**BEASLEY, ALLEN, CROW,  
METHVIN, PORTIS & MILES, P.C.**  
272 Commerce Street  
Montgomery, Alabama 36104  
Telephone: 334-269-2343  
[dee.miles@beasleyallen.com](mailto:dee.miles@beasleyallen.com)

*Class Counsel  
(additional counsel appear on signature page)*

April N. Ross (*pro hac vice*)  
Rachel P. Raphael (*pro hac vice*)  
**MORGAN, LEWIS & BOCKIUS LLP**  
1111 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
Telephone: (202) 739-3000  
[april.ross@morganlewis.com](mailto:april.ross@morganlewis.com)  
[rachel.rafael@morganlewis.com](mailto:rachel.rafael@morganlewis.com)

Mark A. Feller (SBN 319789)  
**MORGAN, LEWIS & BOCKIUS LLP**  
One Market  
Spear Street Tower  
San Francisco, CA 94105  
Telephone: (415) 442-1000  
mark.feller@morganlewis.com

Renee D. Smith (*pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
333 W. Wolf Point Plaza  
Chicago, IL 60654  
Telephone: (312) 862-2310  
renee.smith@kirkland.com

Richard C. Godfrey (*pro hac vice*)  
**QUINN EMANUEL URQUHART &**  
**SULLIVAN, LLP**  
191 N. Wacker Drive Suite 2700  
Chicago, IL 60606  
Telephone: (312) 705-7400  
[richardgodfrey@quinnmanuel.com](mailto:richardgodfrey@quinnmanuel.com)

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RAUL SIQUEIROS, et al.,

**Plaintiffs,**

V.

GENERAL MOTORS LLC.

**Defendant.**

Case No.: 16-cv-07244-EMC

**STIPULATION AND JOINT MOTION  
TO HOLD MOTIONS IN ABEYANCE  
WITH ~~PROPOSED~~ ORDER**

Hon. Edward M. Chen

1 Plaintiffs Joshua Byrge, Jill Cralley, Todd Cralley, William Davis, Jr., Gabriel Del Valle,  
 2 Carlos Gamez, Larry Goodwin, John Graziano, Rudy Sanchez, Scott Smith, and Garet Tarvin (the  
 3 “Plaintiffs”) and General Motors LLC (“GM”) (collectively, the “Parties”), hereby stipulate and  
 4 jointly move this Court for an order holding pending motions in abeyance for ninety (90) days, with  
 5 one exception.

6 WHEREAS, on February 9, 2024, Plaintiffs filed their Motion for Final Judgment,  
 7 Prejudgment Interest, Statutory Attorneys’ Fees, and Costs (ECF No. 654) and their Motion for  
 8 Common Fund Attorneys’ Fees and Costs, and Class Representative Service Awards (ECF No.  
 9 655) (“Fee Motions”) following a jury trial of the certified class claims in September and October  
 10 2022.

11 WHEREAS, on September 18, 2024, the Court held a hearing on Plaintiffs’ Fee Motions,  
 12 and instructed plaintiffs to provide a more precise estimate of the number of North Carolina class  
 13 members by November 20, 2024.

14 WHEREAS, on October 2, 2024, Plaintiffs Tarvin, Del Valle, and Davis informed the Court  
 15 of their consent to dismissal of their individual claims under Fed. R. Civ. P. 41(a)(1)(A)(ii) (ECF  
 16 No. 703).

17 WHEREAS, on November 20, 2024, Plaintiffs filed a Motion for Authorization of Text  
 18 Messaging to Potential Class Members, requesting the Court allow the Class Administrator to  
 19 contact, via text messaging, potential North Carolina Class members whose membership has not  
 20 yet been verified (ECF No. 704). Plaintiffs’ efforts to contact potential members of the North  
 21 Carolina Class are ongoing.

22 WHEREAS, GM does not oppose Plaintiffs’ Motion for Authorization of Text Messaging  
 23 to Potential Class Members, and the Parties submit that the motion may be decided without oral  
 24 argument.

25 WHEREAS, as of December 3, 2024, Plaintiffs’ Fee Motions and Plaintiffs’ Motion for  
 26 Authorization of Text Messaging to Potential North Carolina Class Members remain pending.

27 WHEREAS, the Parties have agreed to explore potential resolution of this action and seek  
 28 to preserve the status quo during those discussions and thus respectfully ask the Court to hold

1 Plaintiffs' Fee Motions (ECF Nos. 654 and 655) in abeyance for ninety (90) days.

2 WHEREAS, the Parties agree that Plaintiffs' efforts to identify and quantify members of  
3 the North Carolina class should continue.

4 IT IS HEREBY STIPULATED that, subject to this Court's approval, Plaintiffs Fee Motions  
5 (ECF Nos. 654 and 655) will be held in abeyance for ninety (90) days, up to and including March  
6 3, 2025, during which time the Court will proceed with ruling on Plaintiffs' unopposed Motion for  
7 Authorization of Text Messaging to Potential Class Members (ECF No. 704).

8  
9 DATED: December 3, 2024

10 /s/ Adam J. Levitt

11 Adam J. Levitt (*pro hac vice*)

12 John E. Tangren (*pro hac vice*)

13 Daniel R. Ferri (*pro hac vice*)

14 Blake Stubbs (*pro hac vice*)

15 **DICELLO LEVITT LLP**

16 Ten North Dearborn Street, Sixth Floor

17 Chicago, Illinois 60602

18 Telephone: 312-214-7900

19 alevitt@dicelloselevitt.com

20 jtangren@dicelloselevitt.com

21 dferri@dicelloselevitt.com

22 bstubbs@dicelloselevitt.com

23 Mark Abramowitz (*pro hac vice*)

24 **DICELLO LEVITT LLP**

25 7556 Mentor Avenue

26 Mentor, Ohio 44060

27 Telephone: 440-953-8888

28 mabramowitz@dicelloselevitt.com

29 W. Daniel "Dee" Miles, III (*pro hac vice*)

30 H. Clay Barnett, III (*pro hac vice*)

31 J. Mitch Williams (*pro hac vice*)

32 Rebecca D. Gilliland (*pro hac vice*)

33 **BEASLEY, ALLEN, CROW,**

34 **METHVIN, PORTIS & MILES, P.C.**

35 272 Commerce Street

36 Montgomery, Alabama 36104

37 Telephone: 334-269-2343

38 Dee.Miles@beasleyallen.com

39 Clay.Barnett@beasleyallen.com

40 Mitch.Williams@beasleyallen.com

41 Rebecca.Gilliland@beasleyallen.com

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44 Respectfully submitted,

45 /s/ April N. Ross

46 April N. Ross (*pro hac vice*)

47 Rachel P. Raphael (*pro hac vice*)

48 **MORGAN, LEWIS & BOCKIUS LLP**

49 1111 Pennsylvania Avenue, N.W.

50 Washington, D.C. 20004

51 Phone: (202) 739-3000

52 april.ross@morganlewis.com

53 rachel.rafael@morganlewis.com

54 **MORGAN, LEWIS & BOCKIUS LLP**

55 Mark A. Feller (SBN 319789)

56 One Market

57 Spear Street Tower

58 San Francisco, CA 94105

59 Phone: (415) 442-1000

60 mark.feller@morganlewis.com

61 **KIRKLAND & ELLIS LLP**

62 Renee D. Smith (*pro hac vice*)

63 333 W. Wolf Point Plaza

64 Chicago, IL 60654

65 Phone: (312) 862-2310

66 renee.smith@kirkland.com

67 **QUINN EMANUEL URQUHART &**

68 **SULLIVAN, LLP**

69 Richard C. Godfrey (*pro hac vice*)

70 191 N. Wacker Drive Suite 2700

71 Chicago, IL 60606

72 Phone: (312) 705-7400

73 richardgodfrey@quinnemanuel.com

74 *Attorneys for General Motors LLC*

1       *Class Counsel*

2       Jennie Lee Anderson (SBN 203586)

3       Lori E. Andrus (SBN 205816)

4       **ANDRUS ANDERSON LLP**

5       155 Montgomery Street, Suite 900

6       San Francisco, California 94104

7       Telephone: 415-986-1400

8       jennie@andrusanderson.com

9       lori@andrusanderson.com

10      Anthony J. Garcia (pro hac vice)

11      **AG LAW P.A.**

12      3602 West Euclid Avenue

13      Tampa, Florida 33629

14      Telephone: 813-259-9555

15      anthony@aglawinc.com

16      *Additional Counsel for Plaintiffs and the  
17      Classes*

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## **ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated this 5 day of December, 2024

  
THE HONORABLE EDWARD M. CHEN  
UNITED STATES DISTRICT JUDGE